

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

WISCONSIN ALUMNI RESEARCH  
FOUNDATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 3:14-cv-00062-WMC

**JOINT STIPULATION REGARDING EXECUTION OF JUDGMENT**

WHEREAS, on October 26, 2015, the Court entered judgment against Defendant Apple Inc. (“Apple”) in favor of Plaintiff Wisconsin Alumni Research Foundation (“WARF”) in the amount of \$234,277,669.00. (Dkt. 657) (“Judgment”);

WHEREAS, in the interest of avoiding unnecessary expense Apple and WARF are discussing use of an irrevocable letter of credit as an alternative to a bond as security for the Judgment; and

WHEREAS the parties require longer than the 14 days provided by Rule 62(a) to determine whether they can agree to acceptable terms for such a letter of credit and, if so, to put it in place with the issuing bank.

NOW THEREFORE, having met and conferred, the parties hereby stipulate and agree as follows:

1. WARF will not make any attempt or effort to execute on the Judgment prior to December 1, 2015.

**IT IS SO STIPULATED AND AGREED.**

The parties jointly and respectfully request that this Court issue an order adopting this stipulation.

Dated: November 2, 2015

Respectfully submitted,

/s/ Gary Frischling

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